

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

JOHNNY W. POPE, II,

Plaintiff,

v.

WESTERN TIDEWATER  
COMMUNITY SERVICES BOARD,

Defendant.

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

Civil Action No. 2:21cv449

**MOTION FOR SUMMARY JUDGMENT**

Defendant, Western Tidewater Community Services Board, by counsel, and pursuant to Fed. R. Civ. P. 56, hereby moves for entry of summary judgment in its favor. The reasons supporting this Motion are set forth in the accompanying Memorandum of Law.

WESTERN TIDEWATER COMMUNITY  
SERVICES BOARD

By: \_\_\_\_\_/s/  
Of Counsel

Jeff W. Rosen, Esq. VSB No. 22689  
Lisa Ehrich, Esq. VSB No. 32205  
Jeffrey A. Hunn, Esq. VSB No. 45487  
PENDER & COWARD, P.C.  
222 Central Park Avenue, Suite 400  
Virginia Beach, VA 23462  
Phone: (757) 490-6293  
Fax: (757) 497-1914  
[jrosen@pendercoward.com](mailto:jrosen@pendercoward.com)  
[lehrich@pendercoward.com](mailto:lehrich@pendercoward.com)  
[jhunn@pendercoward.com](mailto:jhunn@pendercoward.com)  
*Counsel for WTCSB*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of May, 2022, I will electronically file the foregoing ***Motion for Summary Judgment*** with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) to the following:

Steven B. Wiley, Esq. (VSB #47531)  
WILEY LAW OFFICES, PLLC  
440 Monticello Avenue, Suite 1817  
Norfolk, VA 23510  
Phone: (757) 955-8455  
Fax: (757) 319-4089  
[swiley@wileylawoffices.com](mailto:swiley@wileylawoffices.com)  
*Counsel for Plaintiff*

\_\_\_\_\_/s/\_\_\_\_\_  
Jeff W. Rosen, Esq., VSB #22689  
PENDER & COWARD, PC  
222 Central Park Avenue  
Virginia Beach, VA 23462  
Phone: (757) 490-6293  
Fax: (757) 497-1914  
[jrosen@pendercoward.com](mailto:jrosen@pendercoward.com)  
*Counsel for WTCSB*